

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

**UNIVERSITY OF TENNESSEE RESEARCH
FOUNDATION AND SAINT MATTHEW
RESEARCH, LLC,**

Plaintiffs,

v.

**AMAZON.COM, INC. AND AMAZON WEB
SERVICES, INC.,**

Defendants.

Civil Action No. 3:17-cv-00181-HSM-CCS

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINES ON BRIEFING OF
AMAZON.COM, INC. AND AMAZON WEB SERVICES, INC.’S MOTION TO DISMISS
FOR IMPROPER VENUE AND FAILURE TO STATE A CLAIM
PENDING VENUE DISCOVERY**

Plaintiffs University of Tennessee Research Foundation (“UTRF”) and Saint Matthew Research, LLC (“SMR”) (collectively, “Plaintiffs”), through undersigned counsel, respectfully request that the Court enter an Order modifying the briefing schedule pertaining to Defendants Amazon.com, Inc. and Amazon Web Services, Inc.’s (collectively, “Amazon”) Motion to Dismiss For Improper Venue and for Failure to State a Claim (Dkt. No. 24, “Motion”) to allow time for Plaintiffs to obtain discovery from Amazon relating to Amazon’s pending Motion.

The current deadline for Plaintiffs’ Response to Amazon’s Motion is September 21, 2017. Plaintiffs respectfully request, and Defendants do not oppose, an Order extending the briefing schedule on Amazon’s pending Motion to allow for reasonably-tailored, venue-related discovery. Accordingly, Plaintiffs hereby request, and Defendants Amazon.com, Inc. and Amazon Web Services, Inc. do not oppose, that briefing on Amazon’s pending Motion be extended and that the following briefing and venue discovery schedule be entered as to Plaintiffs and Amazon:

Event	Deadline
Deadline to complete venue discovery	October 27, 2017
Plaintiffs' deadline to respond to Amazon's Motion	November 10, 2017
Amazon's deadline to file its Reply in support of its Motion	November 21, 2017

Dated: September 15, 2017

Respectfully submitted,

s/Daniel P. Hipskind
WAYNE A. RITCHIE II (BPR 013936)
JAMES R. STOVALL (BPR #032512)
RITCHIE, DILLARD, DAVIES
& JOHNSON, P.C.
606 West Main Avenue, Suite 300
P.O. Box 1126
Knoxville, Tennessee 37901-1126
(865) 637-0661
E-mail: war@rddjlaw.com
E-mail: jstovall@rddjlaw.com

OF COUNSEL:

Dorian S. Berger (CA SB No. 264424)
Admitted pro hac vice
Daniel P. Hipskind (CA SB No. 266763)
Admitted pro hac vice
Eric B. Hanson (CA SB No. 254570)
Admitted pro hac vice
BERGER & HIPSKIND LLP
1880 Century Park East, Ste. 815
Los Angeles, CA 95047
Telephone: 323-886-3430
Facsimile: 323-978-5508
E-mail: dsb@bergerhipskind.com
E-mail: dph@bergerhipskind.com
E-mail: ebh@bergerhipskind.com

*Attorneys for Plaintiffs University of
Tennessee Research Foundation and Saint
Matthew Research, LLC*

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this September 15, 2017 with a copy of this document via the Court's CM/ECF System.

/s/ Daniel P. Hipskind

Daniel P. Hipskind